

Exhibit A

Stipulation

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

POLISHED.COM INC., *et al.*,¹

Debtors.

Chapter 7

Case No. 24-10353 (TMH)

(Jointly Administered)

HINNA ZEESHAN and SOPHIA
SAADA, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

POLISHED.COM INC., APPLIANCES
CONNECTION, INC., 1 STOP
ELECTRONICS CENTER, INC., GOLD
COAST APPLIANCES, INC., SUPERIOR
DEALS INC., AC GALLERY INC., JOE'S
APPLIANCES LLC, YF LOGISTICS LLC,
1847 PARTNERS LLC AND ELLERY W.
ROBERTS,

Defendants.

Adv. Proc. No. 24-50040 (TMH)

**STIPULATION EXTENDING TIME FOR
CHAPTER 7 TRUSTEE TO ANSWER OR RESPOND TO COMPLAINT**

Hinna Zeeshan and Sophia Saada (the "Plaintiffs") and George L. Miller (the "Trustee")
on behalf of the chapter 7 bankruptcy estates of Polished.com Inc., Appliances Connection, Inc.,
1 Stop Electronics Center, Inc., Gold Coast Appliances, Inc., Superior Deals Inc., AC Gallery

¹ The Debtors in these chapter 7 cases, along with the last four digits of each Debtor's federal tax identification number are: Polished.com Inc. (3938); 1 Stop Electronics Center, Inc. (9485); AC Gallery Inc. (3629); Appliances Connection Inc. (8366); Gold Coast Appliances, Inc. (1575); Joe's Appliances LLC (8354); Superior Deals Inc. (0096); and YF Logistics LLC (8373).

Inc., Joe's Appliances LLC, and YF Logistics LLC (collectively, the "Polished Defendants"), by and through their undersigned counsel, hereby stipulate and agree as follows:

RECITALS

1. On April 12, 2024, the Plaintiffs filed their *Class Action Adversary Proceeding Complaint for Violations of (1) WARN Act 29 U.S.C. § 2101, et seq., (2) New York Warn Act, NYLL § 860 et seq. and (3) New Jersey Millville Dallas Airmotive Plant Job Loss Notification Act* [Adv. Docket No. 1] (the "Complaint") in the above-captioned adversary proceeding.

2. On April 30, 2024, the Clerk of Court issued the *Summons and Notice of Pretrial Conference in an Adversary Proceeding* [Adv. Docket No. 5] (the "Summons").

3. Pursuant to the Summons, the deadline for the Trustee to answer or otherwise to respond to the Complaint (the "Response Deadline") was originally May 30, 2024. The Court has not yet set a pretrial conference.

4. The Plaintiffs and the Trustee have previously entered into stipulations to extend the Response Deadline. Most recently, on April 3, 2025, the Court entered an order [Adv. Docket No. 28] approving a stipulation extending the Response Deadline to July 29, 2025.

5. To avoid the cost of litigation while the Parties attempt to resolve the asserted claims, the Plaintiffs and the Trustee hereby enter into this stipulation (the "Stipulation"), pursuant to which the Plaintiffs have agreed to extend the Response Deadline to January 26, 2026.

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WHEREFORE, the Parties stipulate that:

1. The Trustee shall have through and including **January 26, 2026** to answer or otherwise to respond to the Complaint.
2. This Stipulation is without prejudice to any party's rights.

Dated: July 29, 2025

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Peter J. Keane

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Dated: July 29, 2025

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